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26 Member  
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Metro Government.



# Office of Internal Audit

Solid Waste Management and  
Services

Waste Reduction Center  
Revenue Administration



# **Audit Report**

**Office of Internal Audit**

## **Solid Waste Management and Services**

**Waste Reduction Center  
Revenue Administration**

**June 2006**



**Solid Waste Management and  
Services**

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## Transmittal Letter

June 19, 2006

The Honorable Jerry E. Abramson  
**Mayor of Louisville Metro**  
Louisville Metro Hall  
Louisville, KY 40202

**Re: Audit of Waste Reduction Center Revenue**

### Introduction

An audit of the revenue activity at the Waste Reduction Center was performed. The Waste Reduction Center is administered by the Metro Solid Waste Management and Services department. The primary focus of the audit was the operational and fiscal administration of the activity. This included how the Waste Reduction Center processes, records, and monitors the activity.

The examination was conducted in accordance with Government Auditing Standards issued by the Comptroller General of the United States and with the International Standards for the Professional Practice of Internal Auditing issued by the Institute of Internal Auditors.

As a part of the review, the internal control structure was evaluated. The objective of internal control is to provide reasonable, but not absolute, assurance regarding the achievement of objectives in the following categories:

- Achievement of business objectives and goals
- Effectiveness and efficiency of operations
- Reliability of financial reporting
- Compliance with applicable laws and regulations
- Safeguarding of assets

There are inherent limitations in any system of internal control. Errors may result from misunderstanding of instructions, mistakes of judgment, carelessness, or other personnel

factors. Some controls may be circumvented by collusion. Similarly, management may circumvent control procedures by administrative oversight.

### **Scope**

The operating procedures for the Waste Reduction Center (WRC) revenue activity were reviewed through interviews with key personnel. The focus of the review was the operational and fiscal administration of the activity. Tests of sample data were performed for transactions from fiscal year 2006 (July 1, 2005 to November 30, 2005). Activity reviewed included WRC register reports, billing documents, bank statements, and financial postings.

The review included assessing whether activity was processed, recorded, and monitored accurately and appropriately. The details of the scope and methodology of the review will be addressed in the Observations and Recommendations section of this report. The examination would not identify all weaknesses because it was based on selective review of procedures and data.

### **Opinion**

It is our opinion that the administration of the Waste Reduction Center (WRC) revenue activity is weak. The internal control rating is on page 5 of this report. This rating quantifies our opinion regarding the internal controls, and identifies areas requiring corrective action.

Opportunities to strengthen the administration of WRC revenue activity were noted in several areas. Examples of these include the following.

- **General Administration.** Documented policies and procedures for WRC activity were not readily available to personnel administering the activity. Though policies and procedures were eventually located, they are outdated and do not reflect current practices. This may lead to inconsistencies and inefficiencies with processing.
- **Segregation of Duties.** There is not adequate segregation of duties with regards to the cashiering and billing functions associated with the WRC revenue activity. The Cashier has the ability to run register activity reports, as well as perform voids and refunds in the absence of supervisory personnel. In addition, one person prepares invoices for billed customers, receives payments, and prepares the deposit.
- **Monitoring and Reconciliation.** Monitoring and reconciliation of WRC activity is weak. The process is often cursory in nature and is not documented. This lack of oversight does not adequately protect the funds and weakens the reliability of activity statements.

- **Activity Processing.** Several forms used to administer WRC activity are not being used efficiently. This may hinder the reconciliation process and limit the ability of the forms to provide an effective audit trail. There were also some cases of missing or inadequate support documentation for billed customers.

The implementation of the recommendations in this report will help improve the internal control structure and effectiveness of the administration of WRC revenue activity.

### **Corrective Action Plan**

Representatives from the Solid Waste Management and Services department have reviewed the results and are committed to addressing the issues noted. Solid Waste's corrective action plans are included in this report in the Observations and Recommendations section. We will continue to work with the Solid Waste department to ensure the actions taken are effective to address the issues noted.

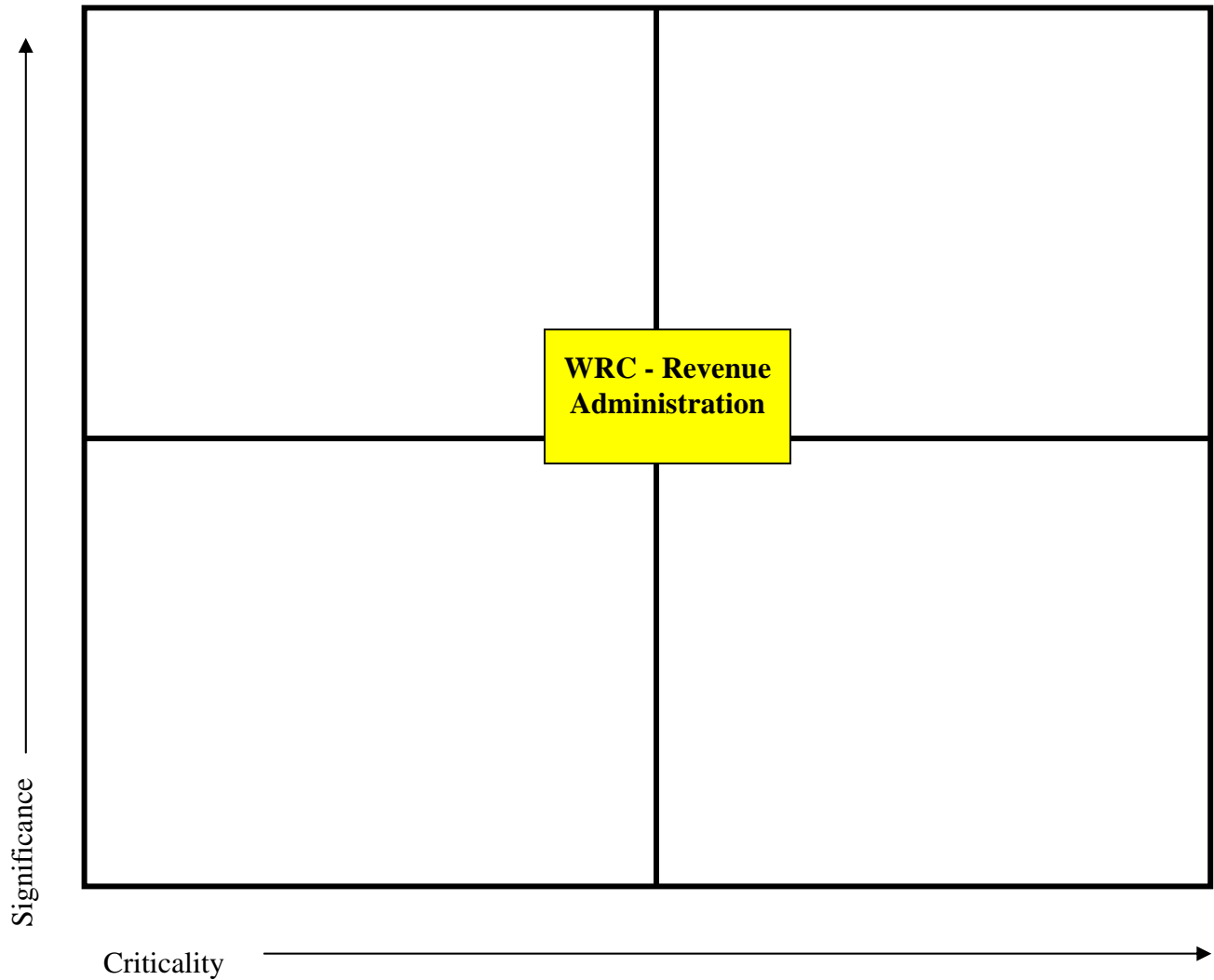
Sincerely,



Michael S. Norman, CIA  
Chief Audit Executive

cc: Louisville Metro Council Audit Committee  
Louisville Metro Council Members  
Deputy Mayors  
Secretary of the Cabinet for Public Works and Services  
Director of Solid Waste Management and Services

**Internal Control Rating**



<u>Legend</u>			
<b><u>Criteria</u></b> <b><u>Issues</u></b>	<b><u>Satisfactory</u></b> Not likely to impact operations.	<b><u>Weak</u></b> Impact on operations likely contained.	<b><u>Inadequate</u></b> Impact on operations likely widespread or compounding.
<b><u>Controls</u></b>	<b><u>Effective.</u></b>	Opportunity exists to improve effectiveness.	Do not exist or are not reliable.
<b><u>Policy Compliance</u></b>	Non-compliance issues are minor.	Non-compliance issues may be systemic.	Non-compliance issues are pervasive, significant, or have severe consequences.
<b><u>Image</u></b>	No, or low, level of risk.	Potential for damage.	Severe risk of damage.
<b><u>Corrective Action</u></b>	May be necessary.	Prompt.	Immediate.

## **Background**

The Louisville Metro Solid Waste Management and Services department (SWMS) offers a variety of services that make waste disposal convenient and environmentally sound. The department provides garbage, yard waste, recycling, and junk collection in the Urban Services District and promotes waste reduction and recycling throughout Louisville Metro. Private waste haulers, regulated by the Metro Waste Management District, provide household waste removal in the Suburban Areas.

SWMS' Waste Reduction Center (WRC) provides an alternative bulk waste disposal for all areas of Louisville Metro. The WRC takes in a variety of items such as household junk, tree limbs and stumps, tires, metal waste and more. Fees charged are volume based according to the size of the vehicle. WRC employees administer the fees and assist with the separation of the debris.

The fiscal year 2006 operating budget for Waste Reduction Center revenue is \$500,000. This is comprised of fees charged for dumping at the disposal yard.

This was a scheduled audit.

## **Summary of Audit Results**

### **I. Current Audit Results**

See Observations and Recommendations section of this report.

### **II. Prior Audit Issues**

The Office of Internal Audit previously audited the Waste Reduction Center's revenue activity in April 2000. Unless otherwise noted, all prior weaknesses have been satisfactorily addressed.

### **III. Statement of Auditing Standards**

The audit was performed in accordance with Government Auditing Standards issued by the Comptroller General of the United States and with the International Standards for the Professional Practice of Internal Auditing issued by the Institute of Internal Auditors.



#### **IV. Statement of Internal Control**

A formal study of the internal control structure was conducted in order to obtain a sufficient understanding to support the final opinion.

#### **V. Statement of Irregularities, Illegal Acts, and Other Noncompliance**

The examination did not disclose any instances of irregularities, any indications of illegal acts, and nothing was detected during the examination that would indicate evidence of such. Any significant instances of noncompliance with laws and regulations are reported in the Observations and Recommendations section of this report.

#### **VI. Views of Responsible Officials / Action Plan**

A draft audit report was issued to Solid Waste on March 30, 2006. An exit conference was held at the Solid Waste Management and Services' administrative office on May 22, 2006. Attending were Bob Schindler, Keith Hackett, and Charlie Peterson representing Solid Waste; Mike Norman and Mary Ann Wheatley representing Internal Audit. Final audit results were discussed.

The views of Solid Wastes' officials were received on June 16, 2006 and are included as corrective action plans in the Observations and Recommendations section of the report. The plans indicate a commitment to addressing the issues noted.

## **Observations and Recommendations**

### **Scope**

The Department of Solid Waste Management and Services' procedures for administering Waste Reduction Center (WRC) revenue activity were reviewed. The primary focus of the review was the operational and fiscal administration of the activity. This includes the processing, recording, and monitoring of activity. Applicable personnel were interviewed in order to gain a thorough understanding of the various processes.

WRC revenue activity for five days was judgmentally selected from the population of transactions for the period July 1, 2005 through November 30, 2005. The review focused on information recorded in activity reports, bank deposits, and the Louisville Metro financial system. An assessment of the internal controls and procedures for the administration and planning of activities was performed. The results are as follows.

### **Observations**

There were some issues noted with the administration of Waste Reduction Center revenue activity. As a result, the internal control structure is weakened and its effectiveness impaired. The observations are as follows:

- #1 General Administration
- #2 Segregation of Duties
- #3 Monitoring and Reconciliation
- #4 Activity Processing

Details of these begin on the following page.

## #1 – General Administration

Several issues were noted with the general administration of Waste Reduction Center (WRC) revenue activity. As a result, the internal control structure is weakened and its effectiveness impaired. Specifics include the following.

- Documented policies and procedures to guide WRC personnel in the day-to-day administration and management of revenue activity were not readily available. Once located, it was determined that the policies and procedures are outdated and do not reflect the current practices for the administration of activity. This increases the risk of non-compliance with intended policies and procedures. This can also lead to inconsistencies and inefficiencies with activity processing.
- There were some issues noted with the dumping processes for 501(c)(3) nonprofit organizations.
  - Current practices allow nonprofit 501(c)(3) organizations to receive a discounted rate (1/2 the normal rate) for dumping at the WRC. The current policies and procedures do not address the discounted rate or the approval process for granting discounted rates to nonprofit entities (i.e. verification of official documentation). *Similar issues were noted in a previous audit.*
  - Policies and procedures note that a dumping card, issued to a nonprofit organization for billing and discount purposes, is good for one year from the date of issue. However, the cards do not have an expiration date. Once an organization has been approved, they do not have to re-certify their nonprofit status of 501(c)(3).
  - The discounted rate for nonprofits may conflict with the WRC policy of allowing religious organizations (e.g. churches) free disposals. One description of a possible 501(c)(3) organization listed by the Internal Revenue Service is a religious organization.
- Current practices allow religious organizations to make up to four *free* disposals a month after submitting a formal letter to appropriate WRC personnel. There were some issues noted with this practice.
  - The policies and procedures do not address a limit to the number of times a religious organization can make a disposal in a month. The policies only require that the organization note how many times they plan to use the disposal yard, and that additional letters should be submitted if they need continued service.
  - The policies and procedures do not address the approval process for granting free disposals to religious organizations (i.e. verification of official documentation).
- The WRC allows a business to request a dumping card if they routinely use the facility (i.e. approximately 6-8 times a month). This allows the business to be billed for dumping services rather than requiring immediate payment upon each visit. The

WRC policies and procedures do not address the issuance of dumping cards to businesses that routinely use the facility.

- Though bank deposits are routinely made twice a week, this practice may violate the \$1,000 threshold, which requires that funds be deposited within one business day. Three of five deposits reviewed were not made in a timely manner (days late ranged from two to five business days). Delays in making deposits may put funds at risk of being lost or stolen. The risk is even greater since most of the WRC's transactions involve cash payments. There is also an opportunity cost for loss of earned interest when deposits are delayed. *Similar issues were noted during a prior audit.*
- The WRC requires customers to live or be providing services within the Louisville-Jefferson County Metro area to use the disposal yard. Customers are asked to provide a zip code at the time of making a disposal. However, no written policy or ordinance could be found stating this requirement. In addition, WRC personnel have no means to verify the accuracy of zip code information being provided. *Similar issues were noted during a prior audit.*
- WRC employees expressed concern with regards to the security and safety of the cashier booth. The booth is located next to the road and not in the perimeter of the WRC disposal yard fence.

### **Recommendations**

Appropriate personnel should take corrective action to address the issues noted. Specific recommendations include the following.

- ✓ SWMS management is in the process of reviewing their policies and procedures manual for the WRC. They should ensure the policies and procedures include all pertinent information related to the processing, recording, and monitoring of activity. The manual should include sufficient detail for each job duty performed and copies of forms used. It should be distributed to all applicable personnel and may be used as a training manual for new staff. In addition, key personnel should be trained to help ensure consistent adherence to the requirements. The internal policy and procedures should reflect the most current information and be updated periodically.
- ✓ The WRC policies and procedures should address discounted rates and eligibility requirements for any exceptions to standard disposal fees (e.g. nonprofit entities, routine customers, or free groups). Support documents for eligibility requirements should be obtained and reviewed for appropriateness. Approval for an organization to receive a discounted rate should be properly indicated. The County Attorney's Office should be contacted regarding the treatment of nonprofit entities.
- ✓ If the policy that dumping cards shall expire after one year is still relevant, then the applicable expiration date should be indicated on the cards. As dumping cards expire,



WRC personnel should reevaluate an entity's status before issuing a new card (i.e. determine if a routine customer is still using the facility on a regular basis and have entities re-certify their nonprofit status).

- ✓ All funds should be deposited in a timely manner in accordance to the Department of Finance's Cash Management Policies (weekly or when \$1,000 is exceeded, whichever occurs first). This will help ensure the security of funds and optimize investment income for Metro operations. SWMS may want to explore the possibility of using an armored car service for transporting deposits, especially considering the risks associated with cash.
- ✓ The policy of allowing only customers that live or are providing services in the Louisville-Jefferson County Metro area use of the Waste Reduction Center should be reviewed to determine if it is still appropriate and effective. This will require SWMS management to determine the overall objective of the facility (i.e. provide a service to Metro residents or provide an alternative to illegal dumping) and adjust the policy accordingly.
- ✓ SWMS management should contact physical security experts (i.e. Metro Police) to conduct a security and safety review of the WRC cashier booth.

#### **SWMS Corrective Action Plan**

- Current policies and procedures to guide WRC personnel in the day-to-day administration and management of revenue activity at the WRC will be updated to reflect current practices.
- Current practices allowing nonprofit 501(c)(3) organizations to receive a discounted dumping rate of ½ the normal rate will be continued.
- Verification of official documentation for nonprofit organizations will be required and obtained prior to allowing the discounted rate.
- All dumping cards will have an expiration date of one year from date of issuance stamped on the card. Recertification of nonprofit status will be required annually.
- All nonprofit organizations will be treated equally to include religious organizations. A nonprofit stamp will be used to designate tickets that are charged ½ the normal rate and be validated through the cash register.
- Religious organizations will be charged the discounted rate as are all other nonprofit organizations. Any allowance for free disposal will be issued from the Director's Office in writing.

- WRC policies and procedures will address the issuance of dumping cards to businesses that routinely use the facility.
- Bank deposits are routinely made twice a week due to staffing limitations.
- The WRC has no requirements as to where a customer lives. Any customer is welcome to utilize the services of the WRC.
- The physical location of the WRC cashiers booth will remain the same.

## **#2 – Segregation of Duties**

There were some problems noted regarding the segregation of duties for Waste Reduction Center (WRC) activity. The following types of weaknesses impair accountability, do not properly safeguard assets, and may impede the efficient and effective processing of activity.

- There is not adequate segregation of duties with regards to the WRC cashiering function.
  - The cashier has the ability to run cash register reports (X readings) to verify running balances without clearing out totals. This allows the Cashier an opportunity to compare actual receipts to register report totals. This increases the risk that improper activity could be processed without detection.
    - The policies and procedures for cash register operations do not properly address activity reports / readings. For example, the process describing the reports (X readings) run throughout the day when making deposits to the safe actually refer to closing reports (Z reading). This may result in a register being inappropriately closed and hinder the reconciliation process.
  - The cashier also has the ability to process voids and refunds in the absence of supervisory personnel.
- There is not adequate segregation of duties with regards to the billing function. A single individual generates the invoices, receives payments, and prepares the deposit.

## **Recommendations**

Appropriate personnel should take corrective action to address the concerns noted. Specific recommendations include the following.

- ✓ Ideally, only supervisory personnel should have the system capabilities to run cash register activity reports. This would ensure that those directly involved in the receipt of funds would not be aware of activity totals, which could persuade them to make adjustments to ensure that cash on hand agrees with system totals.
- ✓ Cash register operating procedures should be properly documented in the WRC policy and procedure manual. These should indicate what daily activity reports are to be run and who is authorized to run them. Ideally, measures should be in place to prohibit unauthorized individuals from running register reports (i.e. restrict access to register keys).
- ✓ In cases where a cashier must perform voids or refunds, the transactions should be thoroughly documented and reviewed / reconciled by supervisory personnel.

- ✓ To the extent possible, the same individuals should not have the ability to generate invoices, receive payments, and prepare deposits. In cases where complete segregation is not feasible (e.g., staff size constraints), appropriate compensating controls should be practiced (e.g., supervisory review, monitoring).
- ✓ Solid Waste Management and Services (SWMS) should explore the possibility of using the Louisville Metro Accounts Receivable system for billing customers. The use of the system will help ensure that all revenue is billed and collected in a consistent and timely manner and allow for proper segregation of duties. In addition, processing transactions through this system credits the revenue to the applicable financial center when invoiced, not collected. This would also decrease the administrative responsibilities associated with the billings. SWMS' personnel should contact Metro Finance for assistance with billing customers.

### **SWMS Corrective Action Plan**

- The WRC cashier will no longer have the ability to run X or Z readings. These readings along with voids and refunds will be performed by the on duty supervisor with backup coming from the Administrative Office.
- A reconciliation form will be created and made available to document any X or Z readings and any voids or refunds.
- Where possible, the same individual will not have the ability to generate invoices, receive payments and prepare deposits. If complete segregation of duties is not feasible due to staff limitations, additional supervisory review and monitoring will be implemented.
- MSWM will look into the possibility of using the Louisville Metro Accounts Receivable system for billing customers.



### **#3 – Monitoring and Reconciliation**

There were some weaknesses noted with regards to the monitoring and reconciliation of Waste Reduction Center (WRC) activity. As a result, the internal control structure is weakened and its effectiveness impaired. Examples include the following.

- There is not a formal documented reconciliation of WRC activity. Monitoring and reconciliation is a major component of any internal control structure.
  - Daily activity reports, to include register readings, cash drop tickets, and usage fee tickets are reviewed for appropriateness, but the actual reconciliation of activity is not documented. Discrepancies (if any) are verbally communicated to appropriate personnel for investigation but results are not documented.
  - The number of “free” disposal tickets given to the Cashier each morning is not documented. Also, the free tickets are not reconciled to the sign-in sheet at the end of each day. The free disposal ticket color is different each day, but there is no documented schedule noting the color used each particular day. These practices increase the risk that free tickets could be used inappropriately.
  - Though permit hauler tickets (form used for billed customers) are verified to the number of tickets noted on the sign-in sheet each day, the review is not documented.
  - Supervisory personnel may run random register readings of the cash register throughout the day to reconcile drawer activity totals but the reconciliation is not documented.
- A “C reading” is run to zero out the cash register totals completely at the end of a business week. This resets the cash register receipt numbers back to zero. This process increases the risk that inappropriate transactions could be processed without being detected, especially if reading numbers are not monitored for consecutiveness. WRC personnel could not provide a reason for why this process is performed.
- The WRC deposits are reflected in financial accounts established for Metro General Fund revenue. Reports for these accounts have not been made available to SWMS personnel, therefore proper monitoring and reconciliation has not been performed. *This is not limited to SWMS activity. Similar situations have been identified for other departments. Metro Finance is aware of the issue and is currently considering options to address the concerns.* Regardless, SWMS is responsible for the accurate posting of its activity.

### **Recommendations**

Appropriate personnel should take corrective action to address the concerns noted. Specific recommendations include the following.

- ✓ A major component of any reporting system is proper reconciliation and monitoring. It is imperative that administrative staff reviews the information on a regular basis. This includes reviewing individual transactions for appropriateness, completeness, and adherence to requirements, along with monitoring of financial system reports.
- ✓ Supervisory personnel should perform a *documented* reconciliation on a daily basis of register reports, actual receipts, and dumping / disposal forms (i.e. usage fee tickets, permit hauler tickets, and free tickets). This will help ensure that all activity appears appropriate, complete, and adheres to requirements. Discrepancies should be properly noted and researched.
- ✓ The feasibility of using the cash register to process “free” disposal transactions should be explored. This would allow the customer to receive a register receipt indicating the transaction was free and would eliminate the use of tickets. Supervisory personnel could monitor daily cash register activity reports to ensure that all free transactions were appropriately accounted for (i.e. group name indicated on the sign-in sheet).
- ✓ If it is determined that the cash register can not process “free” transactions, then free tickets should be monitored closely to ensure they are being used appropriately. The color of the free tickets being issued each day should be noted on daily reconciliation forms. The number of tickets issued should be reconciled to the beginning and ending count of tickets on hand. The WRC may want to consider having pre-numbered tickets, as opposed to changing colors, for easier reconciliation purposes.
- ✓ SWMS management should evaluate the practice of resetting the cash register totals back to zero each week. If there is not a practical reason for why this is done, it should be stopped so that risk of undetected transactions is lessened.
- ✓ WRC transactions should be reconciled to the Metro financial statements to ensure the accurate and timely reflection of activity. Since these transactions post to a Metro General Fund revenue account, SWMS’ personnel should work with Metro Finance to determine their role and responsibility in monitoring WRC activity.

### **SWMS Corrective Action Plan**

- The documentation for the reconciliation of cashiering activity will be reviewed and modified so as to ensure completeness. Discrepancies will be communicated in writing and investigation results will be documented.
- Fee tickets will now be used for all “Free” disposals. A stamp will be used to indicate a free dump and the fee ticket will be validated through the cash register. This will eliminate the need for different colored free disposal tickets and insure free tickets are reconciled daily for appropriate usage. The name of the organization will be entered on the ticket for tracking.

- A reconciliation form will be created to reconcile permit hauler tickets and any random cash register readings made during the day for documentation purposes.
- No more “C” readings will be allowed to reset the cash register receipt numbers back to zero.

#### **#4 – Activity Processing**

Some issues were noted with the processing of Waste Reduction Center (WRC) activity. As a result, the internal control structure is weakened and its effectiveness impaired. Specifics include the following.

- Several forms used to administer WRC activity are not being used efficiently. This could hinder the usefulness of the forms in providing a proper audit trail of transactions or usefulness as a reconciliation tool.
  - WRC personnel use a daily sign-in sheet to record the time of a transaction, customer zip code, and usage fee ticket number (form completed for a paying customer). Though the sign-in sheet is also used to track billed customers, the permit hauler ticket number (form completed for a billed customer) is not recorded on the sheet. This makes it difficult to reconcile billed transactions.
    - For three of five days examined, the number of billed customers noted on the sign-in sheet exceeded the number of permit hauler tickets maintained in billing files. This could be an indication that customers were not properly billed for services provided.
  - The permit hauler ticket used for recording billed customers information does not have a place to document the category or size of the load being dumped. The Ticket Administrator verbally notifies the Cashier of the amount to record on the ticket. This weakens the audit trail of the transaction in that the category or type of items dumped cannot be tracked and the amount charged cannot be verified as proper.
  - Usage fee tickets are not being used efficiently. WRC employees complete a three-piece usage fee ticket for each paying customer to document the category of items brought in for dumping and the corresponding fee. A single piece usage ticket is completed as well. Both tickets record the same information. This seems to be an unnecessary duplication of efforts in that one form is given to the customer, while all other copies are kept by the Cashier and eventually forwarded to supervisory personnel.
- There were several cases where support documentation for billed customers was inadequate or missing. This makes it difficult to monitor transactions for appropriateness.
  - There were two cases where the billing support documentation could not be located for the transactions reviewed. The transactions took place during a four-month period when SWMS did not have a full time billing person. It could not be determined if the customer was ever sent an invoice for services provided. *SWMS is reviewing records to determine the status of the invoices and other supporting documents.*
  - All seven of the customer files examined were missing the letter requesting to be billed for use of the disposal yard.



- In addition, four invoices examined were not mailed to the customer in a timely manner (i.e. within five business days of the service date, as a recommended best practice). Billings ranged from 12-24 days after the service date.

### **Recommendations**

Appropriate personnel should take corrective action to address the issues noted. Specific recommendations include the following.

- ✓ WRC personnel should review the forms used in administering daily activity. Changes should be made to the forms so they provide the most beneficial information for tracking and reconciliation purposes.
  - The sign-in sheet should reflect the numbers of permit hauler tickets. This will allow each transaction to be properly tracked and help ensure that applicable customers are properly billed.
  - The permit hauler tickets should indicate the category or size of the load being dumped. This will allow for a proper audit trail of the transactions, as well as help ensure that appropriate amounts are being charged.
  - WRC personnel should review their use of usage fee tickets for efficiency. It may be more efficient if one, two-copy form were completed for each transaction, as opposed to two separate forms. The customer could receive one copy of the form, along with their register receipt (if applicable). The other copy of the form could be maintained by the Cashier as support documentation and then forwarded to supervisory personnel for reconciliation purposes.
- ✓ Care should be taken by WRC personnel to ensure that all applicable customers are properly billed. Permit hauler tickets should be reconciled to the daily sign-in sheets to ensure all tickets are accounted for. The tickets should be forwarded to appropriate personnel for bill processing. Invoices should be mailed in a timely manner (i.e. within five business days of service, as a recommended best practice) to help expedite the receipt of payment.
- ✓ Support documentation for all billed customers should be properly maintained, to include customer letters requesting to be billed. The billing files should be reviewed periodically to ensure documentation is current. Customers should not receive a dumping card, authorizing them to be billed, unless they have submitted a request letter. WRC personnel should review all billing request letters and indicate whether approval is granted. Criteria for granting approval should be appropriately indicated in the WRC policies and procedures manual.
- ✓ All WRC source documentation (i.e. usage fee tickets and permit hauler tickets) should be reviewed on a daily basis to ensure accuracy and completeness. This includes ensuring that all transactions are accounted for, all applicable information is provided, and appropriate rates are charged. Any discrepancies noted should be researched and results documented.

**SWMS Corrective Action Plan**

- The WRC daily sign-in sheet is being abandoned as there is no longer a need to track the zip code location of customers.
- The Permit Hauler Ticket and Usage Fee Ticket are being merged to eliminate the use of two different tickets. This will allow all tickets to be tracked and validated through the cash register system.
- Support documentation will be required before a customer can begin using the WRC.